

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ADREA, LLC,

Plaintiff,

v.

BARNES & NOBLE, INC.,
BARNESANDNOBLE.COM LLC, and
NOOK MEDIA LLC,

Defendants.

Civil Action No. 13-cv-4137 (JSR)

PLAINTIFF'S PROPOSED VOIR DIRE REQUESTS

1. You have been given a list of companies involved with this lawsuit.
 - a. Do you have any negative feelings or opinions regarding any of the companies on this list?
 - b. Have you or an immediate family member or close personal friend ever been employed by any of these companies?
 - c. Have you or an immediate family member or close personal friend ever had a dispute of any kind with any of these companies?
 - d. Have you or an immediate family member or close personal friend ever had a negative experience with a product made or sold by any of these companies?
 - e. Have you or an immediate family member ever had a business relationship with any of these companies?

2. You have been given a list of the attorneys and law firms involved in this lawsuit. Are you related to, or personally acquainted with any of those attorneys, or have you ever been represented by any of those attorneys or other members of the listed law firms?

3. You have been given a list of the individuals who might appear as witnesses in this case. Are you related to, or personally acquainted with, any of those witnesses?

4. Have you previously heard or read anything about this case? If so, what have you heard or read?

5. Have you or a member of your immediate family ever been a plaintiff or defendant in a lawsuit? If yes: Was it as a plaintiff or defendant? What was the nature or subject matter of the lawsuit? What was the outcome of the suit?

6. Have you ever served on a jury? If yes: In what court? What was the case about? Did the case reach a verdict? What was the verdict?

7. Do you have a degree, specialized training, or work experience in the fields of mathematics, engineering, or computer science? Please describe your training or experience in these areas.

8. Do you have a degree, specialized training, or work experience in the field of patents or patent licensing?

9. Do you have a degree, specialized training, or work experience in the fields of finance or economics? Please describe your training or experience in these areas.

10. What is the highest level of education that you have completed? If you attended college or graduate school, what was your major?

11. Are you married? If yes: What is your spouse's occupation?

12. Are you employed? If yes: Please describe your position. Is it full-time or part-time? Please describe any other job that you have held in the last ten years. If you are retired or unemployed, what was the last position that you held?

13. Do you supervise any employees in your current position? If so, how many employees do you supervise? Do you have any control over hiring and firing decisions?

14. Do you have any strong opinions regarding patents, the patent system, or the United States Patent and Trademark Office that might make it difficult for you to be a fair and impartial juror in this case? If yes: What are those views?

15. Do you have any strong views about litigation in general that would make it difficult for you to be a fair and impartial juror in this case? If yes: What are those views?

16. Do you have any attitudes or beliefs that would make it difficult for you to award damages if the patent holder proved there was infringement?

17. Do you believe that most inventions are not really new ideas at all?

18. Do you believe that the patent system discourages innovation?

19. Do you think that patents are used unfairly in order to prevent competitors from entering the market?

20. Do you believe that the U.S. Patent and Trademark Office often makes mistakes? If yes: Please explain.

21. Do you believe that an inventor who gets a patent has a right to make money from his patented invention?

22. Do you believe that it is easy for a company to obtain a patent?

23. Do you believe that it would be unfair to make one corporation pay another corporation millions of dollars in damages even if the evidence and the Court's instruction on the law demonstrate that a patent was infringed?

24. Do you believe that you would be unwilling or unable to award a corporation millions of dollars in damages even if the evidence and the Court's instructions on the law supported such an award?

25. Do you believe that companies that own patents, without making any products from those patents, should not make money by licensing those patents?

26. Have you used an e-reader, eBook reader, or eBook device in the past month?

27. Do you own a Barnes & Noble Nook e-reader device?

28. Have you shopped at a Barnes & Noble store or at barnesandnoble.com in the past 6 months?

29. Is there anything else that you are aware of that would prevent you from being an impartial juror on this case?

Dated: October 2, 2014

Respectfully submitted,

/s/ Colin Cabral

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CERTIFICATE OF SERVICE

I certify that on October 2, 2014, I caused a copy of the forgoing document to be served upon counsel of record for Barnes & Noble, Inc., barnesandnoble.com LLC, and Nook Media LLC by electronic mail.

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/s/ Colin Cabral

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